

DRAFT POLREP No. 3

SITE DESCRIPTION:

Refer to POLREP No. 1 for a discussion of Site conditions and background.

CURRENT ACTIVITIES: (note – add pictures)

Site removal activities from 06/10/12 through 06/23/12 included:

- Completed construction of the three contaminated soil containment cells.
- Developed the following field screening procedure for the removal of contamination to the “maximum extent practicable,” which is based on available information and best professional judgment that considers Site-specific conditions and field measurements. From approximately 0 to 10 feet below ground surface, the subsurface soil is considered not contaminated and can be set aside as clean overburden and reused as backfill material. Beginning at approximately 10 feet below ground surface, the subsurface soil is considered contaminated and this soil will be excavated to an average depth of 20 feet which is deeper than the prior estimate of 17 feet. The excavated soil will be transported to the on-Site contaminated soil containment cells where the soil will be dewatered, sampled, and later transported off-Site for disposal. The soil will be excavated in approximate 5-foot lifts to allow for field observation/measurements and verification of the assumed depths of clean material and contaminated material. The effectiveness of the field measurements and the field screening procedure will be evaluated throughout the removal process and will be revised, if appropriate.
- Conducted an “open house” meeting (06/13/12) to familiarize the local community with project cleanup activities and schedule. For about one hour, project staff provided an overview of the project and responded to a variety of questions including those related to EPA cleanup activities in the Silver Valley and the 03/12 Supreme Court *Sackett v. EPA* decision.
- Conducted the Forest Highway 50 pre-construction meeting (06/15/12) with MDM Construction, Inc., prime contractor located in Hayden Lake, ID. Subcontractors include Poe Asphalt Paving, Inc., Lewiston, ID (asphalt paving); Pugh Brothers Construction, Inc., St. Maries, ID (select borrow, select borrow rock, and road aggregate); AllWest Testing and Engineering, Inc., Hayden, ID (field analytical services), and North Engineering, Post Falls, ID (surveying). Site mobilization is scheduled to begin the week of 07/02/12 and highway reconstruction is scheduled to begin the week of 07/09/12.
- FHWA: As of 06/23/12, beginning at the upgradient portion of the LNAPL plume area and over a distance of 520 feet, approximately 286 cubic yards (yds³) of asphalt has been removed from Forest Highway 50 and transported off-Site for recycling at Busy Bee Recycling, Inc., Spokane, WA; approximately 550 yd³ of base course and 8,576 yds³ of clean overburden material was excavated and set aside on-Site for reuse; and approximately 2,486 yds³ of contaminated material was placed in the on-Site

contaminated soil containment cells to dewater and to be sampled for off-Site disposal. The area in proximity of the former 500,000 gallon AST and other historic features labeled oil bin, oil sinks, and oil tank is heavily contaminated with diesel and heavier fuel oil, both as free or separate phase product and as residual phase product adsorbed onto soil particles. Groundwater was encountered about 10 feet below ground surface, and the excavation extended about 22 feet below ground surface in some sub-areas. Because so much groundwater was flowing into the excavation, absorbent materials and a larger water pump were placed in the bottom of the excavation to prevent the recontamination of excavated areas and to control for the “bathtub ring” effect associated with oil floating on water. Several historic oil and steam lines leading from the former 500,000 AST about 6 feet below the ground surface were encountered.

The Potlatch Free Product Recovery System (FPRS) infiltration trench was discovered within the Highway 50 upslope roadside ditch about 7 feet below ground surface. Two 3-inch PVC pipes were found within the trench. According to a 12/23/94 HartCrowser construction report, the trench crosses beneath the highway near the Potlatch/Bentcik property boundary, and then runs west ending near the location of the former 500,000 gallon AST. The pipes are referred to as carrier and infiltration piping. The full length and width the infiltration trench was visibly contaminated with petroleum product where the carrier piping and infiltration piping were installed parallel to each other.

- FHWA/Bentcik Transition Area: As of 06/23/12, over a distance of 300 feet approximately 1,958 yds³ of clean overburden material was excavated from the FHWA/Bentcik transition area and set aside for reuse, and approximately 1,012 yds³ of contaminated material was placed in the on-Site contaminated soil containment cells to dewater and to be sampled for off-Site disposal. Observations of free product and residual petroleum product for this area are the same as for the Highway 50 area.
- Completed installation of the temporary stream bypass which will enable advancing the excavation further into the upgradient (eastern) portion of the LNAPL plume area.
- Approximately 3,928 yds³ of excess mineral material (i.e., unconsolidated rock and soil slope and slide materials removed from roadways during maintenance activities) was excavated from the Moon Pass Road for use on-Site.
- Start-up of the temporary water treatment system was completed. To date, approximately 446,700 gallons of contaminated groundwater has been treated and discharged to the St. Joe River beginning 06/20. Effluent samples were collected after treating approximately 5,000 gallons (06/14), 10,000 gallons (06/15), and 15,000 gallons (06/16) of groundwater pumped from the initial excavation area. The samples were analyzed for selected semi-volatile organic compounds, selected target analyte list metals, and total PCBs. None of the required water quality discharge parameters were exceeded. Operational samples will be collected and analyzed for the contaminants of concern on an estimated weekly basis. Began water treatment system night operations on 06/20 because groundwater was flowing into the excavation and was saturating the contaminated materials, thus complicating the handling of materials in the contaminated soil containment cells.

- Ongoing maintenance of the temporary bypass roadway.
- Ongoing maintenance and evaluation of general construction BMPs, including site, housekeeping, and stormwater and sediment BMPs.
- Ongoing daily air quality monitoring (weather permitting) at three locations (using a DataRAM4 Model DR-400) and surface water quality monitoring at four locations (using a Horiba Instruments, LTD., Water Quality Checker U-52). The DataRam measures airborne particulate matter, particle size, air temperature, and humidity. The Horiba simultaneously measures the following water quality parameters in aqueous samples: pH, conductivity, turbidity, dissolved oxygen, temperature, oxidation reduction potential, total dissolved solids, and salinity. To date, there have been no exceedances of applicable air and surface water regulatory criteria.
- Ongoing daily tailgate safety sessions discussing the project, potential hazards, required safety equipment, spill prevention and control BMPs, and anything else personnel should know.
- Dismantled the Potlatch 500-gallon AST in preparation for off-Site recycling.
- At the request of the FHWA, snow was removed from Gold Summit Pass to enable the FHWA to gain access to that portion of Forest Highway 50 where other road reconstruction work will occur this summer (MP 76 to MP 88.5).
- Personnel on-Site: EPA – 1; START – 2; ERRS – 18.

PLANNED REMOVAL ACTIONS:

- Start off-Site transportation and disposal of contaminated materials on or about 06/27/12. Transportation will be provided by R Transport, Inc., George, WA, and the contaminated materials will be disposed of at the Waste Management Graham Road Recycling and Disposal Facility, Medical Lake, WA.
- Mobilization of the Highway 50 roadway reconstruction contractor to the Site.
- Continue excavation of the upgradient (eastern) portion of the LNAPL plume, then advance toward the western portion of the plume to continue excavating clean overburden and contaminated soil from the FHWA property and FHWA/Bentcik transition area, and begin activities on the FHWA/Potlatch transition area.
- Ongoing operation of the water treatment system to ensure it meets the required water quality discharge parameters.
- Ongoing maintenance and evaluation of BMPs.
- Ongoing routine air quality and surface water quality monitoring.

NEXT STEPS:

The next POLREP will be submitted on or about 7 July 2012, and thereafter on an approximate bi-weekly schedule.

KEY/OTHER ISSUES:

- Above average precipitation has caused minor schedule delays. For several days, placing contaminated material into a contaminated soil containment cell was delayed or temporarily suspended because the material was too wet. Additionally, each cell is designed to hold 5,000 yds³ of material, but only about 3,000 yds³ of material could be placed in each cell before it became too difficult to stockpile the material because it is too wet. A daily temporary cover is now placed over the cells to prevent rainfall from entering the cells.
- During off-hours, project personnel witnessed an ATV accident and rendered first aid for more than an hour pending arrival of medical personnel. The injured person was air-lifted to Spokane, WA for medical care.